

EXHIBIT A

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

ERIC SUBER and MARY LYNNE
SUBER, on their own behalf and on behalf of all
others similarly situated,

Plaintiffs,

v.

LIBERTY MUTUAL INSURANCE GROUP,
INC., d/b/a Liberty Mutual Insurance; LIBERTY
MUTUAL INSURANCE COMPANY; SAFECO
INSURANCE COMPANY OF AMERICA; and
LM GENERAL INSURANCE COMPANY,

Defendants.

Case No. 2:21-cv-4750-GAM

**DECLARATION OF MICHAEL B. GARVEY IN SUPPORT OF THE NON-INSURING
DEFENDANTS' MOTION TO DISMISS PLAINTIFFS' COMPLAINT**

Under 28 U.S.C. § 1746, I, Michael B. Garvey, state the following facts are true and correct to the best of my knowledge and belief.

1. My name is Michael B. Garvey, I am over the age of 18, and I am competent in all respects to make this declaration.
2. I am employed by Liberty Mutual Group Inc. ("LMG") as Senior Corporate Counsel in the Legal Corporate Finance and Insurance Regulatory group. I have held this position or a substantially similar position since March 2015.

3. In this role, I am familiar with the structure of LMG,¹ Liberty Mutual Insurance Company (“LMIC”), and Safeco Insurance Company of America (“SICA”).

4. Specifically, I am Assistant Secretary of LMG, LMIC, and SICA.

5. LMG is a corporation organized under the laws of the State of Massachusetts and for federal court jurisdiction or diversity of citizenship disclosure purposes, the principal place of business is 175 Berkeley Street, Boston, Massachusetts. LMG does not hold a license to sell insurance in any state.

6. LMIC has been a wholly owned subsidiary of LMG since November 28, 2001. LMIC is a stock insurance company organized under the laws of the State of Massachusetts and for federal court jurisdiction or diversity of citizenship disclosure purposes, the principal place of business is 175 Berkeley Street, Boston, Massachusetts.

7. SICA has been an indirect subsidiary of LMG and LMIC since September 22, 2008. SICA is a stock insurance company organized under the laws of the State of New Hampshire and for federal court jurisdiction or diversity of citizenship disclosure purposes, the principal place of business is 100 Liberty Way, Dover, New Hampshire 03820.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 10, 2022, in Boston, Massachusetts.


Michael B. Garvey

¹ I am unaware of a Liberty Mutual entity named “Liberty Mutual **Insurance** Group, Inc.” For purposes of this declaration, I assume Plaintiffs intended to name “Liberty Mutual Group Inc.” If this assumption is incorrect, I will submit a supplemental declaration.